

1 **GERALD M. COBB (SBN: 44702)**  
2 **16633 Ventura Boulevard**  
3 **Suite 500**  
4 **Encino, California 91436**  
5 **(818) 990-9710**

6 Attorney for Defendant  
7 **MARCUS RANDALL**

8 **IN THE UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**

10  
11 **UNITED STATES OF AMERICA,**

12 Plaintiff,  
13

14 vs.

15 **MARCUS RANDALL,**  
16

17 Defendant  
18

**CASE NO.: 1:21-CR-00129-JLT-SKO**

**STIPULATION TO CONTINUE  
SENTENCING AND ORDER  
THEREON**

**DATE : August 7, 2023**  
**TIME : 10:00 a.m.**  
**COURT: Hon. Jennifer L. Thurston**

19 **STIPULATION**

20 Plaintiff UNITED STATES OF AMERICA, by and through its counsel of record  
21 JUSTIN J. GILIO, and defendant, by and through defendant's counsel of record GERALD  
22 M. COBB, hereby stipulate as follows:

23 1. By previous order, this matter was set for sentencing on August 7, 2023 at 10:00  
24 a.m..

25 2. By this stipulation, defendant now moves to continue the sentencing until  
26 September 18, 2023 at 10:00 a.m.

27 3. The parties agree and stipulate, and request that the Court find the following:  
28 a) Counsel for defendant desires additional time to consult with his client about

particular factual contentions and conclusions to be drawn therefrom which are contained in the government's sentencing memorandum filed July 31, 2023. This would require meeting with the client at the Lerdo Pre-trial detention facility and jointly reviewing some of the government's exhibits which were made part of it's sentencing memorandum.

b) Counsel for defendant needs additional time to receive and properly present to U.S. Probation Officer JESSE MORA letters written on behalf of the defendant.

c) Counsel for defendant believes that failure to grant the above-requested continuance would deny him the reasonable time necessary for effective preparation for sentencing.

d) The government does not object to the continuance.

e) Based on the above-stated findings, the ends of justice served by continuing the case as requested. Defense counsel to file sentencing memorandum by September 11, 2023.

IT IS SO STIPULATED.

DATED: August 2, 2023

PHILLIP A. TALBERT  
United States Attorney

*Justin J. Gilio*

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JUSTIN J. GILIO  
Assistant United States Attorney

DATED: August 2, 2023

*Gerald M. Cobb*

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GERALD COBB  
Counsel for Defendant  
MARCUS RANDALL

**ORDER**

IT IS SO ORDERED

DATED: August 4, 2023

*Jennifer L. Thurston*  
HON. JENNIFER L. THURSTON